

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 1:24-CV-23180 BECERRA**

HERNANDO QUINTERO and  
ALEJANDRA GABRIELA PARRA,

Plaintiffs,

vs.

CATRINA DADELAND LLC d/b/a  
CANTINA CATRINA and  
JUAN CARLOS CACHOUA,

Defendants.

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**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO RESPOND TO PLAINTIFFS' COMPLAINT [DE 1]**

Defendants, Catrina Dadeland LLC d/b/a Cantina Catrina and Juan Carlos Cachoua, respectfully move this Court for an order extending the time by 2-weeks for them to respond to the Complaint filed on August 21, 2024 by Plaintiffs, Hernando Quintero and Alejandra Gabriela Parra. Good cause exists for such an order for reasons that include the following:

1. Defendants recently retained the undersigned counsel to represent them in this litigation.
2. Absent an extension of time, Defendants' response to the Complaint is due September 13, 2024.
3. Additional time is required to prepare a response to the Complaint and to allow the parties to continue their early informal settlement discussions that may resolve this action.

4. This is Defendants' first extension request and is not sought for the purposes of delay.

5. Plaintiffs do not object to the extension sought in this motion for extension of time.

7. Based on the foregoing, good cause exists for an extension until September 27, 2024, for Defendants to respond to the Complaint.

WHEREFORE, Defendants respectfully request that this Court enter an order extending the time to respond to the Complaint by 2-weeks until September 27, 2024.

**CERTIFICATE OF CONFERRAL**

On September 9th and 10th, the undersigned counsel conferred with Plaintiffs' counsel via email and telephone requesting the extension sought in this motion. Plaintiffs' counsel does not object to the relief sought in this motion.

Respectfully submitted,

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